

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § **Chapter 11**
FIELDWOOD ENERGY, LLC, et al., § **Case No. 20-33948 (MI)**
Debtors. § **(Jointly Administered)**

**NOTICE OF SUBPOENA TO TESTIFY AT A DEPOSITION
IN A BANKRUPTCY CASE**

TO ALL PARTIES AND ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 21, 2021, pursuant to Fed. R. Bankr. P. 7030, 9014 and 9016, and Fed. R. Civ. P. 30 and 45, Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company and Sirius America Insurance Company (collectively, the “S sureties”), by and through their attorney of record, Husch Blackwell LLP, will serve a *Subpoena to Testify at a Deposition in a Bankruptcy Case* (“Subpoena”) in the above-styled jointly administered bankruptcy case, served upon Apache Corp. (“Apache”), by and through Special Delivery, 5470 L B J Frwy, Ste 100, Dallas, Texas 75240. The Subpoena requests that Apache’s designated corporate representative(s) appear for deposition (*via* Zoom) on May 10, 2021 at 1:00 p.m. (CST). The Subpoena also contains a request for the production of documents related to the topics to be covered at the deposition and directs Apache to produce the specified documents to counsel for the Sureties on or before May 10, 2021 at 1:00 p.m. (CST). A true and correct copy of the Subpoena is attached hereto as **Exhibit “A”**.

Dated: April 21, 2021

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Timothy Million

Timothy Million
State Bar No. 24051055
tim.million@huschblackwell.com
Randy Rios
State Bar No. 16935865
randy.rios@huschblackwell.com
600 Travis, Suite 2350
Houston, Texas 77002
Tel: 713-647-6800
Fax: 713-647-6884

**CO-COUNSEL FOR ASPEN AMERICAN
INSURANCE COMPANY, BERKLEY
INSURANCE COMPANY, EVEREST
REINSURANCE COMPANY AND SIRIUS
AMERICA INSURANCE COMPANY**

-AND-

Armen Shahinian, Esq. (admitted *pro hac vice*)
(ashahinian@csglaw.com)
Scott A. Zuber, Esq. (admitted *pro hac vice*)
(szuber@csglaw.com)
Darren Grzyb, Esq. (admitted *pro hac vice*)
(dgrzyb@csglaw.com)
Terri Jane Freedman, Esq. (admitted *pro hac vice*)
(tfreedman@csglaw.com)

Chiesa Shahinian & Giantomaso PC
One Boland Drive
West Orange New Jersey 07052

**ATTORNEYS FOR ASPEN AMERICAN
INSURANCE COMPANY, BERKLEY
INSURANCE COMPANY, EVEREST
REINSURANCE COMPANY AND SIRIUS
AMERICA INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I certify that on April 21, 2021, a copy of this document was served by electronic service on all parties listed as receiving notice *via* the Court's CM/ECF system.

/s/ *Timothy Million*
Timothy Million